

# EXHIBIT 101

**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Gwendolyn Lee. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of DeKalb County in Georgia and my residence address is [REDACTED]  
[REDACTED], Lithonia, GA, 30038.
3. The polling location I served at was the DeKalb County Board of Elections on Memorial Drive.
4. My individual circumstances are the following:
  - a. For about two weeks during Early Vote and on Election Day, my job was to observe the machines and booths where people voted. I did not get any training before I started the job. Previously, I worked at Grady Hospital and am an extremely thorough person.
  - b. As part of my job, I stood at the door and took the card that voters put into the machines, and then gave them the "I voted" sticker. One thing I noticed is that many, many cards would come up invalid. We would have to send the voter back to the person who took their information initially for that person to give the voter a new card. The poll workers would put the malfunctioning cards into a pile and use them over and over. They would count the cards at the end of the night. I think that these cards should not have been put back into rotation.

- c. One day, there was a gentleman who wanted to check something on his cell phone while voting. He asked my colleague if he could. She said he could go to the hallway and she will stand by his voting machine, blocking it from view. Later, someone else asked me the same question. The only training I had received was just listening to what my co-worker told the other man, so I told the voter, sure, go into the hallway and I will block your machine. The Director of the polling location jumped over so fast and said that voters cannot do this. The Director never followed up to make sure I understood what we were supposed to do and not do. I followed up with my original co-worker, who ended managing a polling location on Election Day. I was upset that she had told me the wrong thing. She told me that this is what she had been taught to do.
- d. This woman should not have managed a polling location. When we worked together, I saw her fall asleep at work every day. She ate during work and went to the bathroom constantly. Even the manager said they would never call her back to work Early Voting again, but they still let her manage a polling location on Election Day.
- e. Additionally, the office was a mess and there were many things that should have been done better. The very first day I got there, I was dripping in sweat because it was so hot. I walked to the Fire Department and they checked my blood pressure and said it was near stroke. The

machines were not wiped down on a daily basis, which was unsanitary.

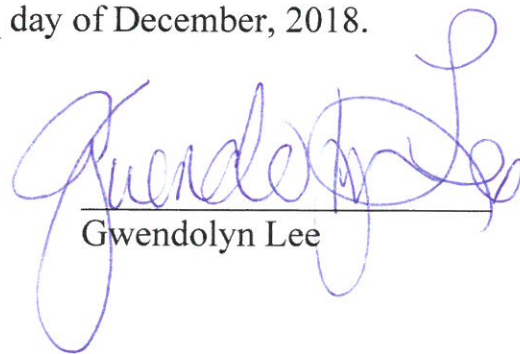
There were papers everywhere, it was not a good situation.

- f.** I only found out that some people received training when I asked when we were getting paid. They said they would only pay people who were trained. When I started, training had already ended. The hours were grueling, 6:30am - 7:00pm.
- g.** I also was not paid on time for working the polls. They said we would be paid sometime after Election Day. On the last day of November, I called and they said if you requested a paper check it should have been received and for direct deposit, I would receive it in one or two more days. I would never have done this if I had to wait an entire month to get paid; I'm on a disability with fixed income. I was so excited to do this work, and I look at DeKalb County as part of the government — this how they treat people?
- h.** Finally, I was not able to vote. I requested my absentee ballot around a week or a week and a half prior, definitely before Halloween, because I was going to work the polls during Early Voting and on Election Day so would be unable to vote then. At the DeKalb County Board of Elections I filled out the application and faxed it to the Walton County Board of Elections. The DeKalb woman showed you the receipt that it was received. My boyfriend went through the mail every day and my

absentee ballot never arrived. I have never received my ballot and was not able to vote.

- i. Now I understand why there are so many doubtful people. DeKalb needs to find people who really care; who they hire is a decision that affects all of us. If you get in a car accident and go to the hospital, you want to have a doctor who cares. The same thing is true for elections. If we want to fix this system, we need to make sure the poll observers are trained. I was really disappointed by this experience.
5. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
6. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
7. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the \_\_\_\_ day of December, 2018.



Gwendolyn Lee